

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

David Gordon Oppenheimer,)	
)	
Plaintiff,)	Case No. 1:22-cv-03813
)	
v.)	
)	
Palace Theater, LLC, Magnificent Mile)	
Productions, Ltd., and Anthony J. Tomaska,)	
)	
Defendants.)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO THE COMPLAINT**

NOW COME Defendants, Palace Theater, LLC, Magnificent Mile Productions, Ltd., and Anthony J. Tomaska, by and through its attorney, Peter J. Shakula, of Wood Phillips, for their Unopposed Motion for Extension of Time to Respond to The Complaint, respectfully state as follows:

1. Counsel for Defendants has only recently been retained by Defendants and needs additional time to assess and prepare any response to the Complaint in this matter.
2. Counsel for the Defendants has been in contact with counsel for Plaintiff and has communicated an offer of settlement.
3. Both parties believe delaying the expense involved in preparing a response to the complaint will allow more resources to be available for settlement.

WHEREFORE, in light of the foregoing, the Defendants respectfully request a 30-day extension to respond to the Complaint.

Dated: September 19, 2023

Respectfully submitted,

/s/ Peter J. Shakula

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Attorney for Defendants

CERTIFICATE OF SERVICE

I certify that on September 19, 2023, a copy of the foregoing UNOPPOSED **MOTION FOR EXTENSION OF TIME TO RESPOND TO THE COMPLAINT** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access the filing through the Court's system. All other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by U.S. mail.

/s/ Peter J. Shakula

Peter J. Shakula